

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

KAREN M. DONNELLY, individually, and)
on behalf of all others similarly situated,)
Plaintiff,) Case No. 4:16-CV-00502
) JURY TRIAL DEMANDED
v.) Removal of Cause No. 16SL-CC00863
APPLIED BUSINESS SERVICES, INC.,)
D/B/A SECURITY COLLECTION) St. Louis County Circuit Court
AGENCY, both as a company as well as)
its various owners,)
Defendant.)

NOTICE TO PLAINTIFF OF FILING OF NOTICE OF REMOVAL

TO: Steven A. Donner
Thomas R. Applewhite
Donner Applewhite, Attorneys at Law
1108 Olive Street, Suite 200
St. Louis, Missouri 63101
Attorneys for Plaintiff

PLEASE TAKE NOTICE that Defendant Applied Business Services, Inc., d/b/a Security Collection Agency has this day filed in the United States District Court for the Eastern District of Missouri, Eastern Division, a Notice of Removal of this action, a true and correct copy of which is served herewith.

Dated: April 11, 2016

Respectfully submitted,

SPENCER FANE BRITT & BROWNE LLP

By: /s/ Patrick T. McLaughlin

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Attorneys for Defendant Applied Business
Services d/b/a Security Collections Agency

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of April, 2016, the foregoing document was filed electronically with the Clerk of the Court, to be served by the Court's electronic notification system and served via U.S. Mail upon the following attorneys of record:

Steven A. Donner
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St. Louis, Missouri 63101
Attorneys for Plaintiff

/s/ Patrick T. McLaughlin